DOCKET SECTION

BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 1997)

Docket No. R97-1

OFFICE OF THE CONSUMER ADVOCATE
FOLLOW-UP INTERROGATORY TO UNITED STATES POSTAL SERVICE
WITNESS MICHAEL K. PLUNKETT
(OCA/USPS-T40-40)
October 17, 1997

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate

Commission, the Office of the Consumer Advocate hereby submits interrogatories and
requests for production of documents. Instructions included with OCA interrogatories

1-7 to the United States Postal Service dated July 16, 1997, are hereby incorporated by
reference.

Respectfully submitted,

GAIL WILLETTE

Director

Office of the Consumer Advocate

Shelley J. Dreifuss

Attorney

Office of the Consumer Advocate

Docket No. R97-1

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OCA/USPS-T40-40. Please refer to Response of United States Postal Service Witness Plunkett to Questions Posed at October 7, 1997 Hearing, filed October 15, 1997. In response to OCA's question concerning the number of insurance claims made in FY 1996, you replied: "In FY 96, 65,996 insurance claims were filed." However, Table 1 in your direct testimony (see page 6) indicates that in FY 1996 a total of 50,037 "lost" claims were paid and 50,768 "damaged" claims were paid. Please clarify and reconcile this data.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

Shelly X. Drufuss SHELLEY S. DREIFUSS

Attornev

Washington, D.C. 20268-0001 October 17, 1997